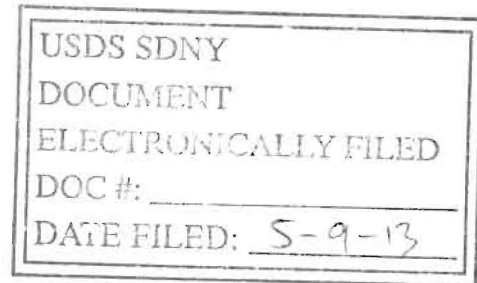


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MEMO ENDORSED

May 8, 2013

Hon. Richard J. Sullivan  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
Courtroom 905  
40 Foley Square  
New York, NY 10007


**Re: United States v. Newman, et al., Cr. No. 12-121 (RJS)**

Dear Judge Sullivan:

As Your Honor knows, we represent Todd Newman in the above-captioned matter. We write this letter in connection with Mr. Newman's surrender date. The Court has ordered that Mr. Newman must surrender to the Bureau of Prisons on July 8, 2013. In order to permit Mr. Newman to spend the summer with his daughter while she is not in school, we respectfully request that Mr. Newman be permitted to surrender on the Tuesday after Labor Day, September 3, 2013. We have conferred with the government and it does not oppose this request.

Thank you for your consideration of this matter.


Respectfully submitted,

  
Stephen Fishbein  
John Nathanson

*Attorneys for Todd Newman* further extension of time would be inappropriate.

cc: All counsel

Although the Court is sympathetic to Defendant's desire to spend more time with his daughter before he begins serving his sentence, the Court has already afforded Defendant more than two months to put his affairs in order. In light of the seriousness of Defendant's crimes, and for the reasons set forth at his sentencing, *Attorneys for Todd Newman* further extension of time would be inappropriate. Accordingly, Defendant's request is DENIED.

  
SO ORDERED  
Date: 5/8/13  
RICHARD J. SULLIVAN  
USDC SDNY

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